

WIAB 01-02

DATE: March 11, 2003
TO: All Local Workforce Investment Areas
FROM: Cheryl A. Brush, Chief, Workforce Systems Bureau
SUBJECT: WIA Monitoring Process

The Grants Management Unit has been involved in restructuring the WIA monitoring process. In the past, compliance monitoring has always centered around annual, on-site visits with selected Service Providers. While these visits will continue to be an integral part of the process, we feel several program elements can be evaluated at a time other than during the on-site visit. We have broken the monitoring process into three parts to be completed in three separate quarters of the program year, each year, as follows:

<u>Accomplished during</u>	<u>Type</u>	<u>Timeframe covered in review</u>
1 st Quarter	Participant File Review	July 1 – September 30
2 nd Quarter	On-Site Review	July 1 – December 31
3 rd Quarter	Financial/Reports Review	July 1 – March 31

While Grants Management staff review participant data, reports, financial documents/data, and participant files informally on a regular basis, we believe formalizing the process on a quarterly basis benefits our program as it promotes objectivity, ensures consistency, and a more comprehensive and systematic approach to compliance.

Separating into components and disseminating the compliance reviews over a broader period of time will also enable Grants Management staff to focus on equally important program elements during the on-site visit, such as participant interviews, worksite visits and technical assistance for staff. We can identify training needs early in the year and customize technical assistance around those needs during the On-Site visit.

As you can see from the above table, the Financial Monitoring Review is scheduled to take place this quarter, and is currently under way in some regions, and soon to be under way in others. You will find attached the Financial and On-Site Monitoring Tools. The Participant Monitoring Tool will be revised in the near future, and will be forwarded to you at a later date.

Should you or your staff have questions with the information contained in the Monitoring Tools, please feel free to contact your assigned Grants Manager.

Attachments

WIA SERVICE PROVIDER REVIEW

Program Year: _____

Financial/MIS Review

Provider Name:	Cost Center Number:
WIA Agreement Number:	Reviewer _____
Date(s) of Review:	Name(s): _____

PRIOR REVIEW

Describe any related findings or improvements identified during the most recent Participant File Review and/or On-Site Review that require attention during this Financial Review.

Review Date _____

Review Codes: 1: Finding 2: Needs Improvement 3: None 4: Exemplary

FINANCIAL MANAGEMENT

Review the Service Provider's Budget, Program Planning Summary and DATA ENTRY, REPORTING, FORMS SUBMISSION AND RECORDS RETENTION REQUIREMENTS section of the Provider Agreement.

1. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Has the Service Provider submitted requests for payment in the proper format and in a timely manner?
Reviewer Note: Access the contract payment system and review the accounting payment file. Each Provider Agreement specifies the required method of payment and time frames; this question is not applicable to Job Service Agreements.

2. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Based on the Subrecipient's budget and program planning summary, are actual expenditures reflective of mid year projections? If not, does the 2nd quarter Continuous Improvement report include an action plan to address the deficiency? Is the action plan producing results? *Reviewer Note: Compare WIA Financial Status Report information (forms 33&34) to quarterly projections for personnel and non –personnel; the WIA Grant Forecast Summary (Budget Report 62) should be used for Job Service Agreements. Participant obligations and expenditures can be viewed on the WIA MIS.*

3. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Do participant payments meet the test of “reasonable, necessary and allowable: If “emergency assistance” or “cash payments” were authorized, did the provider exhaust all other options prior to using WIA resources? *Reviewer Note: a 5% sample (active participants) of participant wage payments and supportive services (representative of actual activities) should be included as part of this review.*

4. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Has the Service Provider maintained the WIA MIS ‘Site Participant Obligation Register’? *Reviewer Note: a review of the on-line register should reflect reasonable expenditure projections and timely updates. Total costs should not exceed obligations and system accruals should be monitored for accuracy and timeliness.*

5. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Has the Service Provider submitted a copy of their last independent audit and has it been reviewed by IDOL accounting staff? *Reviewer Note: Findings or concerns noted within the audit or as a result of IDOL's review should be noted and carried forward to the next On-Site Review. Corrective action measures can then be monitored to ensure continued compliance.*

WIA MIS

6. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the Provider have a working knowledge of the WIA MIS system? Do management reports reflect current participant data? Are data quality reports reviewed and corrected on a regular basis? *Reviewer Note: report data should reflect current client information, expenditures should not exceed obligations, 1st and 3^d quarter exit information should be entered in a timely fashion, data quality reports should reflect regular review and remedies when appropriate, etc. If technical assistance is needed, it may be provided now or carried forward to the On-Site Review and included as part of the TA delivery at that time.*

NOTES

WIA SERVICE PROVIDER REVIEW

Program Year: _____

On-site Review

Provider Name:	Cost Center Number:
WIA Agreement Number:	Reviewer _____
Date(s) of Review:	Name(s): _____

PRIOR REVIEW

Describe any related findings or improvements identified during the most recent Participant File review and/or Financial/Reports/Misc Review that require attention during this On-Site review.

Review Date _____

Review Codes: 1: Finding 2: Needs Improvement 3: None 4: Exemplary

STATEMENT OF WORK

Review the Statement of Work with the Provider. Are they meeting contract objectives and do their processes follow contract requirements?

1. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Describe participant intake and eligibility process; include actual steps taken by participant and case manager to accomplish pre-assessment and verify program eligibility.

2. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Describe participant selection process. *Reviewer Note: The objective here is to determine whether the providers' participant selection process follows federal/state standards and that the process is fair and equitable. In regions utilizing a priority point system, the Provider should demonstrate the means of assessment and selection using this system. In those regions that do not utilize a priority point system, some other demonstrable means of selection must be in place.*

3. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the Provider provide information to each applicant and participant on the full array of services available in the area? *Reviewer Note: All services do not need to be provided by the Provider being reviewed; each WIB should have developed procedures and materials on the full array of services available in the area; applicants and enrollees should have access to service listings or materials for the entire region.*

4. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Is there any evidence of violation of the nepotism standards? *Reviewer Note: In addition to the prohibition against a site hiring a relative into a training position, the Provider may not hire a person in any position funded under WIA if a member of that person's immediate family is engaged in any administrative or support function in the hiring and/or funding organization.*

5. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Describe the Provider's continuous Improvement process and how it contributes toward meeting performance measures and fulfilling goals identified on the Agreement's program planning summary.

6. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Describe special youth requirements, include the minimum youth expenditure rate and provision of the 10 required elements.

1. *tutoring, study skills training, and instruction leading to completion of secondary school, including dropout prevention strategies;*
2. *alternative secondary school services, as appropriate;*
3. *summer employment opportunities that are directly linked to academic and occupational learning;*
4. *as appropriate, paid and unpaid work experiences, including internships and job shadowing;*
5. *occupational skill training, as appropriate;*
6. *leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors during non-school hours, as appropriate;*
7. *supportive services;*
8. *adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;*
9. *follow-up services for not less than 12 months after the completion of participation, as appropriate; and*
10. *comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate.*

7. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Describe the participant exit and follow up process. In addition to client services, include a description of the technical steps necessary for MIS data entry and document submission.

SUPPLEMENTAL REPORTING

8. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

The outcome data for WIA performance measures is based on Unemployment Insurance wage records and supplemental reporting. If the project has conducted supplemental reporting to document outcomes, this documentation must be maintained at the provider level. Does the project maintain a supplemental documentation file that includes the required documentation?

COMPLAINTS/RECORDS RETENTION

9. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the Provider maintain a log of complaints filed, including those that allege discrimination? *Reviewer Note: this can be a complaint log where complaints of discrimination would be filed; it must be kept confidential to the extent practical (to allow investigations).*

10. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Has the Provider properly retained prior year agreement records and files? *Reviewer Note: WIA requires that records be maintained for a period of not less than three years from the date of final grant payment; these records need not be retained on premises.*

PROPERTY/EQUIPMENT

11. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the provider possess WIA purchased or leased equipment? If so, describe the procedures in place to ensure that it is safeguarded, properly identified and that it is used for authorized purposes? *Reviewer note: the Inventory List will be required to make this determination.*

12. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Are WIA funded equipment purchases of \$2,000 or more included in the budget, with a current inventory listing maintained for these items, along with a WIA attached property tag? Has the State Administrative Entity received and granted a request for purchase of such equipment?

FINANCIAL MANAGEMENT/PROCUREMENT

The reviewer will need access to the Provider's financial records and a copy of the local IWB procurement policy for accurate review of this section

13. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the Provider's accounting system provide for a comparison of actual Subgrant expenditures with budgeted amounts? *Reviewer note: this question is not applicable to Job Service Agreements.*

14. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the Provider accounting system provide for a level of detail that allows identification of costs and chargeability to the WIA program? *Reviewer note: Vouchers, receipts, timesheets and all other payments must be identifiable as WIA costs; track a voucher/payment and timesheet to confirm answer. This question is not applicable to Job Service Agreements.*

15. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Has the Provider requested or received reimbursement for expenditures not authorized by the Subgrant Agreement? *Reviewer Note: This review should compare line item Subgrant amounts and expenditure types with the accounting records to determine if the Provider is adhering to the intent of the agreement*

16. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the Provider either direct charge all costs or use a clear and viable cost allocation system? *Reviewer Note: This question is not applicable to Job Service Agreements*

17. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Are program costs considered reasonable, necessary, allowable, and allocable? *Reviewer Note: To be reasonable, the costs must be at levels no greater than fair market value for the good or service; to be necessary, there must be a clear connection between the WIA costs and successful operation of Subgrant activities; to be allowable, costs must not be listed as unallowable by OMB circulars or the General Provisions and Assurances; to be allocable, the costs must clearly be attributable to the WIA program.*

18. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Does the Provider exercise proper control of WIA funds, such as the safeguarding of blank checks and/or supportive service orders?

19. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

If the Provider utilizes motor vehicles in carrying out agreement activities, is the minimum required coverage in effect? *Reviewer Note: Minimum required coverage is \$500,000 combined single limits per occurrence*

20. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Were any sole source purchases made? Is justification for this purchase method maintained in Provider files in accordance with local policy? *Reviewer note: A sole source item is an item with only a single supplier. Many times agencies send requests for sole source purchases that describe an item made only by one manufacturer, however the item is distributed and readily available from many different suppliers. As long as there is more than one potential bidder or offeror for the property item then there is no justification for a sole source determination.*

UNION/POLITICAL/RELIGIOUS ACTIVITIES

21. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Based on a financial records review and on-site interviews/observations, is there any evidence to suggest:

- WIA funds have been used by the Provider to support or deter union activities or
- Participants or WIA funded staff have engaged in political activity while be paid with WIA funds, or
- WIA funds have been used in support of any religious or anti-religious activities?

EQUAL OPPORTUNITY/NONDISCRIMINATION

22. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Is EO and nondiscrimination information provided according to State and Federal requirements?:

- Has the notice, "Equal Opportunity Is the Law," been posted in conspicuous locations where applicants/registrants, participants, eligible applicants/registrants and employees can easily view it?
- If a significant number of persons in the population base have limited English proficiency, is the notice posted in the appropriate language?
- Do recruitment materials including written, electronic (websites or PowerPoint presentations), and broadcast media distributed to the public contain the following:

- Equal Opportunity Employer/Program
- Auxiliary Aids and Services Available Upon Request to Individuals With Disabilities
- TDD/TTY Through Idaho Relay Service 1-800-337-3529

Reviewer note: this information is available online in the MIS as WIAP 1-00, page 15

23. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

Are efforts being made to serve people as reflected in population groups? *Reviewer note: look at target of materials distributed to the public and outreach plans if they have them (not required).*

Compliance with 504 of Rehabilitation Act of 1973

24. ☐ Finding ☐ Needs Improvement ☐ None ☐ Exemplary

How is programmatic accessibility and physical accommodation provided? *Reviewer note: If serving disabled, are services provided in the most integrated setting—i.e., reasonable accommodation—reasonable modification; is communication as effective as with others—i.e., auxiliary aids, signage, TTY/TTD; outreach; does the physical location appear to be architecturally accessible? The physical accommodation is not applicable to Job Service Agreements*

[illegible]